

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

United States Courts
Southern District of Texas
FILED

United States of America

Southern District of Texas

March 23, 2022

v.

Oscar Obed MANZANARES, USC, YOB:2000)
 Jose LUNA-Duran, MX, YOB: 1977)
 Arlando GARCIA-Garcia, MX, YOB: 1982)
 Martin VELA-Alanis, MX, YOB: 1964)
 Martin Adrusbel VELA, USC, YOB: 1987)
 Jose Bernardo GONZALEZ-Gomez, MX, YOB:1967)

Nathan Ochsner, Clerk of Court
 Case No M-22-0576-M.

 Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 22, 2022 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 846

Conspiracy to possess with intent to distribute more than 5 kilograms of
 cocaine, a schedule II controlled substance

This criminal complaint is based on these facts:

Continued on the attached sheet and made part of this complaint:

☒ Continued on the attached sheet.

/s/ J. Michael Salinas

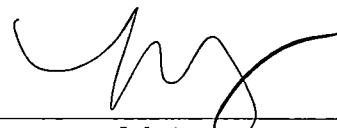
Complainant's signature

Sworn to and executed by reliable electronic means, and
 attested telephonically per Fed. R. Cr. 4.1, and
 probable cause found on:

J. Michael Salinas / HSI Special Agent

Printed name and title

Approved by AUSA Peter I. Brostowin

Date: 03/23/2022 7:16 AM


Judge's signature

City and state: McAllen, Texas

Nadia S. Medrano, U.S. Magistrate Judge

Printed name and title

Attachment A

On March 22, 2022, Homeland Security Investigations (HSI) Special Agents (SAs) conducted a surveillance operation targeting Oscar MANZANARES, a previously identified member of a drug trafficking organization (DTO) operating in the McAllen, Texas area of responsibility (AOR). During the operation, members of the surveillance team observed MANZANARES as he arrived at a business located on the 1400 block of E. Jackson Ave in McAllen, Texas and met with a second individual, later identified as Jose LUNA-Duran. After a brief interaction, LUNA-Duran took possession of MANZANARES' vehicle, a gray GMC Terrain and departed the area while MANZANARES walked inside of the business.

Members of the surveillance team followed LUNA-Duran to a property in the area of Trenton Rd. and Raul Longoria Rd. An aerial surveillance team consisting of Customs and Border Protection (CBP) Air and Marine Operations (AMO) Air Interdiction Agents (AIAs) observed the GMC Terrain drive under a carport on the property and saw two (2) subjects on the property unload items from the Terrain and transfer the items to a black pick-up on location. Air Interdiction Agents (AIAs) also observed as an item was removed from the black pick-up and transferred to the Terrain.

Following the transfer of items between the vehicles, members of the surveillance team followed the Terrain back to the 1400 block of E. Jackson Ave. and upon arrival, members of the surveillance team approached and detained LUNA-Duran and MANZANARES for further investigation. After a K9 activation, subsequent search of the vehicle revealed a bulk amount of US currency. LUNA-Duran and MANZANARES were transported to the HSI-McAllen Field Office for further investigation.

During the same time frame, a secondary surveillance team, including a CBP AMO aerial surveillance team observed the black pick-up which received the items from the Terrain depart the original property and drive into a separate property on Trenton Rd. The aerial surveillance team observed what appeared to be a large duffel bag removed from the black pick-up and the secondary surveillance team consisting of HSI SAs and TFOs arrived at the property to attempt a consensual search and made contact with four males on location, identified as Martin Adrusbel VELA, Martin VELA-Alanis, Arlando GARCIA-Garcia and Jose Bernardo GONZALEZ-Gomez.

As the secondary surveillance team arrived at the residence on Trenton Rd., surveillance team members observed VELA grab a large duffel bag and attempt to conceal it from law enforcement. Surveillance team members spoke with VELA, who identified himself as the homeowner and was asked for consent to search the property, to which VELA denied. At this point VELA-Alanis approached HSI SAs and was advised as to why law enforcement was on location. VELA-Alanis then freely stated to SAs that a black pick-up truck which arrived on location had just delivered a load of cocaine to the property. All males on the property were detained for investigation and HSI Special Agents obtained a search warrant for the property.

During the execution of the search warrant, fifteen bundles of a white powdery substance which tested positive for the properties and characteristics of cocaine were located in the duffel bag that members of the surveillance team observed VELA attempt to conceal. The total amount of cocaine seized was 15.36 kilograms. Following the discovery of the cocaine, all four males were transported to the HSI-McAllen Field Office for further investigation.

While at the HSI-McAllen Field Office, LUNA-Duran was interviewed by HSI SAs. LUNA-Duran requested legal counsel and the interview was terminated.

HSI SAs conducted an interview with MANZANARES who admitted to knowledge that the Terrain contained between 10 – 15 bundles of cocaine. MANZANARES stated that he was responsible for importing cocaine into the United States on this day and multiple occasions in the past several months and stated that he was paid up to \$1000 in US currency per crossing. MANZANARES further stated that he had exchanged vehicles with LUNA-Duran on multiple prior occasions.

During an interview with GARCIA-Garcia, he admitted to knowledge that he received fifteen (15) bundles of cocaine earlier in the day. GARCIA-Garcia stated that the bundles of cocaine were delivered to him by a male he knows as "Flaco" who met him at a predetermined location in an SUV. GARCIA-Garcia was driving the black pick-up which was observed at the same location with the GMC Terrain and stated that he was at the residence to turn the cocaine over to VELA. GARCIA-Garcia stated that he was going to be paid \$500 in US currency for his role.

During an interview with VELA-Alanis, he admitted to knowledge of the fifteen (15) bundles of cocaine that was delivered to his residence on Trenton Rd. VELA-Alanis further stated that he operated a cocaine stash house and was compensated \$100 in US currency for every bundle of cocaine that he stored.

During an interview with VELA, he admitted that he knew cocaine had been delivered to his residence on Trenton Rd. VELA stated that he had knowledge of prior drug loads being delivered to his property but that he wasn't directly involved in the operation. VELA stated that his role was minor and consisted of mostly opening the property gates for drug laden vehicles when his father, VELA-Alanis, would call him and ask him to do so. VELA stated that he was not compensated for his role.

During an interview with GONZALEZ-Gomez, he stated that he witnessed a subject in a black pick-up (GARCIA-Garcia), arrive at the residence and hand a duffle bag to VELA. Later during the interview, VELA stated that he believed the duffle bag contained drugs. GONZALEZ-Gomez stated that he had knowledge of cocaine loads being delivered to the property between once a week or every fifteen (15) days. GONZALEZ-Gomez further stated that often times, he would assist by unloading boxes of cocaine bundles, counting them and placing the bundles in backpacks. GONZALEZ-Gomez stated that every time he assisted, he was paid \$100 in US currency for his role.